



STILLMAN LEGAL, P.C

www.FightForUrRights.com
42 BROADWAY, 12TH FLOOR, NEW YORK NY 10004

October 26, 2023

Via ECF

Hon. Vera Scanlon
United States Magistrate Judge
United States District Court for the Eastern
District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Berrio v. Brookstone Developers
Letter Requesting Relief from the Court**

Dear Judge Scanlon:

I am writing as counsel for my client, Mr. Berrios, in connection with a motion submitted to the Court almost two (2) months ago. We respectfully request Your Honor's immediate consideration of the matter due to the pressing and unforeseen circumstances that have emerged since its submission.

Approximately two months ago, both parties, jointly submitted a motion for Your Honor's review. This motion remains under your consideration, and we appreciate the time and attention your court has devoted to this matter thus far.

However, I must bring to Your Honor's attention the sudden and tragic developments that have arisen in my client's life. My client's father recently passed away in his home country, leaving his mother alone and in a vulnerable state. Given these circumstances, my client is faced with an urgent and moral imperative to return to his country of origin to provide the support and care his mother desperately requires during this difficult time.

In light of these extraordinary and unforeseen developments, we respectfully request Your Honor's approval of the pending motion. We believe that a compassionate and expedited approach to this matter would reflect the principles of fairness and justice that your Court embodies.

Thank you for your consideration and understanding.

Respectfully submitted,

/s/

Lina Stillman

42 Broadway, 12th Floor

New York, NY 10004

Tel: (212) 832-1000

Fax: (212) 203-9115

LS@StillmanLegalPC.com

cc: All counsel of record (via ECF and email)